

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CASEY  
KIRSCHNER; ALLCORE DEVELOPMENT  
LLC; FINBRIT HOLDINGS LLC;  
CHESHIRE VENTURES LLC; CARLETON  
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader  
Plaintiff, Intervening  
Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS, LLC,

Interpleader Defendants,  
and

AMAZON.COM, INC., and AMAZON  
DATA SERVICES, INC.,

Interpleader Defendants,  
Interpleader Counter-Plaintiffs.

**PLAINTIFFS' NOTICE OF COMPLIANCE WITH APRIL 8, 2022 ORDER**

Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (“Plaintiffs” or “Amazon”) hereby provide notice that they are submitting a declaration by D. Matthew Doden (the “Doden Declaration”) in compliance with the Honorable Theresa C. Buchanan’s order at the April 8, 2022 motions hearing in the above-captioned matter. The Doden Declaration references and is supported by select documents, which Plaintiffs are submitting as exhibits thereto.<sup>1</sup>

As the Doden Declaration demonstrates, document discovery and other developments in the case since January 2022 have revealed a wealth of new evidence about the individuals and entities named as new defendants in Plaintiffs’ Proposed Third Amended Complaint. Through that new evidence, Amazon has obtained substantial and specific details regarding the new proposed defendants’ knowledge, intent, and participation in the kickback scheme at issue in this litigation. *See* Doden Decl. ¶¶ 5–15. After carefully reviewing and analyzing all of this discovery material, Amazon concluded that the substantial and specific evidence it had obtained was sufficient to support allegations containing the particularity required to satisfy Federal Rule of Civil Procedure 9(b) as against the new proposed defendants. Amazon accordingly determined that it could add the new defendants named in the Proposed Third Amended Complaint in good faith, and timely moved for leave to do so. *See* Dkts. 608, 616.

Dated: April 18, 2022

Respectfully submitted,

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/s/ Michael R. Dziuban  
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Claudia M. Barrett (*pro hac vice*)  
David W. Casazza (*pro hac vice*)  
Michael R. Dziuban (Va. State Bar No. 89136)  
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<sup>1</sup> Amazon has redacted all Personally Identifiable Information from the exhibits to the Doden Declaration.

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*Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

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*s/ Michael R. Dziuban*

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